

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION**

IN THE MATTER OF:

Case No.: **20-41841-MAR**

Chapter **13**

Honorable **Mark A. Randon**

Joseph R. Rice
and **Lorraine D. Rice**

Debtors.

JOSEPH L. GRIMA (P 44756)

Attorney for Debtors

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**OBJECTION TO PROOF OF CLAIM OF
CHRISTIAN FINANCIAL CREDIT UNION (PACER CLAIMS REGISTER #3)**

NOW COMES Debtors, Joseph R. Rice and Lorraine D. Rice, by and through Counsel, Joseph L. Grima & Associates, P.C., and objects to the Proof of Claim of Christian Financial Credit Union (PACER Claims Register #3) as follows:

1. On February 10, 2020, the Debtors filed a Petition under Chapter 13 of Title 11, United States Bankruptcy Code. A hearing on confirmation is scheduled for May 13, 2020.
2. On February 19, 2020, creditor Christian Financial Credit Union (the "Creditor") filed a secured Proof of Claim (PACER Claims Register #3) indicating a security interest in a 2008 GMC Envoy automobile.
3. Debtors had surrendered the 2008 GMC Envoy automobile to Creditor prior to the filing of the current Chapter 13 Bankruptcy.

WHEREFORE, Debtors respectfully request that this Honorable Court disallow the Proof of Claim filed by Christian Financial Credit Union (PACER Claims Register #3).

Respectfully submitted,

DATED: February 24, 2020

sws

/s/ Joseph L. Grima
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